

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Amy Jo Koopman,

No. 21-cv-1852 (PJS-ECW)

Plaintiff,

v.

The City of Robbinsdale; Christine Allen,
individually and in her official capacity;
Joshua Heasley, *individually and in his*
official capacity; and Nichole Saba,
individually and in her official capacity,

**DECLARATION OF
VIRGINIA MCCALMONT**

Defendants.

I, Virginia R. McCalmont, declare as follows:

1. I am an attorney at Forsgren Fisher McCalmont DeMarea Tysver LLP and counsel of record for Plaintiff Amy Koopman in this matter.
2. I make this declaration based on my personal knowledge of the matters set forth herein.
3. The current unopposed motion to amend the Pretrial Scheduling Order is the first time that any of the Parties have sought to modify the scheduling order in this case.
4. Over the last four months, the Parties—through counsel—have been diligently engaged in discovery efforts, including propounding and responding to interrogatories, requests for admission, and production of documents.

5. The Parties have also exchanged documents.

6. Although the Parties have been diligently engaged in discovery efforts, limitations on witness and counsel availability have precluded the Parties from taking depositions to date.

7. Numerous depositions have now been scheduled and will occur over the course of the next three weeks, including the depositions of all three individually-named Defendants (April 18-20); another police officer witness (April 25); the City of Robbinsdale (May 5); and the Plaintiff (May 10).

8. These depositions are necessary for the Parties to assess whether pleading amendments are necessary.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 15, 2022.

s/ Virginia R. McCalmont
Virginia R. McCalmont